

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FÖRSTA AP-FONDEN AND DANSKE
INVEST MANAGEMENT A/S,
Individually and on Behalf of All Others
Similarly Situated,

Civil No. 12-3070 (JNE/HB)

CLASS ACTION

Plaintiffs,

v.

ST. JUDE MEDICAL, INC., DANIEL J.
STARKS, JOHN C. HEINMILLER, ERIC
S. FAIN, MICHAEL T. ROUSSEAU, and
DONALD J. ZURBAY,

Defendants.

**CLASS REPRESENTATIVES' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

Class Representatives Första AP-fonden and Danske Invest Management A/S, on behalf of themselves and members of the Court-certified Class, respectfully move this Court, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for an Order: (1) granting preliminary approval of the proposed settlement of the above-captioned action (the “Settlement”) as embodied in the Stipulation and Agreement of Settlement dated July 7, 2016 (the “Stipulation”); (2) approving the proposed form and manner of providing notice of the Settlement to the Class; (3) appointing A.B. Data, Ltd. as Claims Administrator; (4) appointing The Huntington National Bank as the Escrow Agent for the Settlement proceeds; and (5) setting a schedule for completion of further Settlement-related proceedings, including providing notice to the Class and a final fairness hearing. Defendants will not be opposing this motion.

This motion is based on the supporting memorandum of law, the Stipulation and supporting exhibits, the papers and filings on record in this matter, and such additional evidence or argument as may be presented by the parties.

Dated: July 7, 2016

Respectfully submitted,

s/ James W. Anderson

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